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MEMO ENDORSED

March 27, 2015

3/30/2015

Via E-mail and ECF

Hon. Denise L. Cote,
United States District Judge,
Daniel Patrick Moynihan United States Courthouse,
500 Pearl Street, Room 1610,
New York, New York 10007-1312.

Re: FHFA v. Nomura Holding America Inc., et al., No. 11-cv-6201

Approved. In the future, the parties do not need to seek permission to redact borrower information from publicly filed documents.

Denise Cote
3/30/15

Dear Judge Cote:

On behalf of all parties, we write to submit proposed redactions to Defendants' Trial Affidavit of Michael Hedden ("Hedden Affidavit"), pursuant to the Court's direction that the parties meet and confer regarding proposed redactions to the direct testimony of witnesses. (Mar. 18, 2015 Trial Tr. at 842:10-843:1.)

The parties have met and conferred and agree that, consistent with Sections 2.6, 2.7, 2.8 and 2.9 of the First Amended Protective Order dated January 11, 2013, the affidavit should be filed in redacted form because it contains non-party borrower information. The portions of the affidavit to be redacted are identified in the following chart.

Defendants inadvertently filed a redacted version of the Hedden Affidavit on PACER last evening and request the docket entry be removed. (Doc. No. 1527.) Defendants will refile on ECF after the Court rules on the parties' proposed redactions.

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Affidavit of Michael Hedden	
Location of Redaction	Reason for Redaction
Pg. 1	Personal information
Pg. 29	Borrower information
Pg. 30	Borrower information
Pg. 33	Borrower information
Pg. 37	Borrower information
Pg. 39	Borrower information
Pg. 40	Borrower information
Pg. 41	Borrower information
Pg. 43	Borrower information
Pg. 44	Borrower information
Pg. 46	Borrower information
Pg. 48	Borrower information
Pg. 49	Borrower information
Pg. 50	Borrower information
Pg. 52	Borrower information
Pg. 55	Borrower information
Pg. 57	Borrower information
Pg. 58	Borrower information

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Pg. 59	Borrower information
Pg. 60	Borrower information
Pg. 61	Borrower information
Pg. 67	Borrower information
Pg. 68	Borrower information
Pg. 70	Borrower information
Pg. 73	Borrower information
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Pg. 85	Borrower information
Pg. 87	Borrower information
Pg. 88	Borrower information
Pg. 89	Borrower information
Pg. 92	Borrower information
Pg. 93	Borrower information
Pg. 94	Borrower information

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Pg. 96	Borrower information
Pg. 97	Borrower information
Pg. 99	Borrower information
Pg. 100	Borrower information
Pg. 101	Borrower information
Pg. 102	Borrower information
Pg. 103	Borrower information
Pg. 104	Borrower information
Pg. 105	Borrower information
Pg. 106	Borrower information

A highlighted copy of the affidavit is being submitted to the Court via e-mail.

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Respectfully Submitted,

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